

Comments to the Draft EIR/EIS of the Interim South Delta Program
January 29, 1997

Components of the proposed Interim South Delta Program have risks that constitute significant adverse impacts according to NEPA and CEQA guidelines (vol. I, pg. 5-5). Mitigation measures lack adequate specifics and are not accounted for in funding estimates. Advancement of ISDP project plans **must** be predicated upon detailed studies of, and mitigation for the adverse impacts of **current** CVP & SWP operations in the South Delta. Project related hydrodynamics forming the basis of project components are based on DWR computer modeling which simulate delta water flow patterns and surface elevations. Significant impacts from siltation were expressed repeatedly at the public meetings and DWR representatives have stated that the models don't simulate siltation or scouring. Field studies are needed to detail the severity of siltation in South Delta channels and set forth adequate dredging plans.

"Subsidence is a major concern in the Delta, increasing the water pressure on levees and, therefore, the probability of levee failure and flooding (DWR 1993b). Consequently, the levees are in need of continual maintenance." (vol. I, pg. 5-2). The SDWA Lawsuit recognizes inadequate channel capacities in the South Delta as a cause for insufficient water to meet summer irrigation needs. Raising channel surface elevations with flow control structures conflicts with criteria set forth in the draft document itself. It ignores the both the reason for the problem and the risks of the proposed solution. Lowering channel bottoms is a component of the alternative that includes the Consolidation of SDWA Agricultural Diversions (vol. I, pg. 3-16). **Why is this not the preferred alternative?** The money required to design and build the flow control structures would dredge millions of cubic yards of silt. Additionally, upgrading and updating irrigation methods and practices translates into improved efficiencies of use by the agricultural water users. Phasing out the returns of used irrigation waters is a component to improving South Delta water quality as well.

Channel capacities and navigability **must** be restored and maintained to pre CVP conditions (1940s) as the first step to improving water conditions in the upper reaches of Old River, Middle River, Grant Line Canal, Salmon Slough, Tom Paine Slough and Paradise Cut. Additionally, the navigability into Del's Boat Harbor and Lazy M Marina **must** be restored, along with the north sides of channel intersections where deposits from reverse flows have formed hazardous shoals. The Temporary Barriers Project has already shown itself to be the harbinger of death to upper Old River as testified to at the public meetings. Because a temporary barrier in Grant Line canal has never been installed, its impacts remain unproven. Nature will reclaim the reaches of low flow as tidal and seasonal marshes all too soon unless long term dredging solutions are initiated.

Another impact of current CVP & SWP operations that requires detailed field study and mitigation **before** any additional diversions into the Forebay are approved, is that of reverse flow channel velocities and related scouring. Fixed water flow velocity monitoring facilities need to be established in West Canal upstream and downstream of the existing intake bay and on one of the islands north of the currently proposed Northern Intake, in Old River north of Italian Slough and in Victoria Canal. I would be available to assist with such an installation on King Island.

My last comments about the Draft EIR/EIS of the proposed ISDP are to its less than proportionate study and mitigation of the project's impacts on the human species in comparison to fish and other mammal species. Although not threatened or endangered, thousands and thousands of Northern California residents from more than ten Bay Area counties continually derive recreational benefits from the California Delta. The lack of public facilities for recreation in the South Delta is well documented in this, as well as the 1990 Draft. Appendix L, the South Delta Recreation Study, to the 1990 Draft stated that; "It is estimated that 25 percent of the people using the Delta are recreating in the South Delta region." (I believe this figure is conservative). "At least 503 acres of land are needed in the South Delta to meet 1990 recreation demands." "Additional acreage is needed for staging. There are no recreation standards for staging. Water skiing, for example, needs land space for takeoffs, dropoffs, and for participant waiting. 'Proximity of picnic facilities' was preferred by water skiers in research conducted by Urban Research Development Corporation (1980). Staging areas should provide activity opportunities for water ski observers and participants who are waiting for their turn to be on the water." "Staging areas are also used to separate groups of skiers and reduce congestion in single takeoff and dropoff areas." (a current problem in Victoria and North Canals). **"Staging areas are needed in the South Delta"**. Some of the finest skiing conditions in the Delta are found in Victoria, Grant Line and West canals and they should be the focus of improvements and facilities for recreation.

NOTHING has been done in the ensuing six years to address the needs of these recreation demands, which most certainly exceeds the 1990 estimates in concert with the increases in boat registrations and growth in local county populations. The planned developments of Gold Rush City and Mountain House will account for additional pressures on the need for public recreation facilities in the South Delta.